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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, formerly known as Bankers*
11 *Trust Company of California, N.A., as Trustee for American Home Mortgage Assets Trust 2006-*
12 *1*

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST
16 COMPANY, FORMERLY KNOWN AS
17 BANKERS TRUST COMPANY OF
18 CALIFORNIA, N.A., AS TRUSTEE FOR
19 AMERICAN HOME MORTGAGE ASSETS
20 TRUST 2006-1,

21 Plaintiff,

22 vs.

23 THUNDER PROPERTIES INC.; KERN &
24 ASSOCIATES, LTD.; DOE INDIVIDUALS I
25 through X, inclusive; and ROE
26 CORPORATIONS XI through XX, inclusive,

27 Defendants.

Case No.: 3:16-cv-00381-MMD-WGC

**STIPULATION AND ORDER TO STAY
CASE PENDING SETTLEMENT**

Plaintiff, Deutsche Bank National Trust Company, formerly known as Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage Assets Trust 2006-1 (“Deutsche Bank”) and Defendant, Thunder Properties, Inc. (“Defendant” or “Thunder Properties”), by and through their respective counsel of record, stipulate and agree to stay all proceedings in this case pending settlement of this matter.

1. Deutsche Bank filed its Complaint on June 27, 2016, naming Defendant [ECF No. 1].

2. Deutsche Bank filed its Amended Complaint on September 27, 2017, naming Thunder Properties, Edgewater Homeowners Association (“Edgewater” or “HOA”) and Kern & Associates, Ltd. (“Kern”) [ECF No. 16].

1 3. Defendant, Kern was dismissed pursuant to an Order approving Stipulation
2 entered on November 18, 2017 [ECF No. 32].

3 4. Defendant, HOA was dismissed pursuant to a Minute Order Granting Motion to
4 Dismiss entered on April 4, 2018 [ECF No. 52].

5 5. Discovery is proceeding pursuant to the schedule set forth under a Minute Order
6 entered on April 4, 2018 [ECF No. 53].

7 6. The undersigned attorneys, together with counsel for the HOA, have agreed upon
8 a global resolution of this matter. They anticipate that it will take between approximately 30
9 and 60 days to prepare, review and execute appropriate settlement documents.

10 7. The parties, thus, stipulate to stay this case including discovery and dispositive
11 motion deadlines pending the execution of settlement documents and the dismissal of this
12 action.

13 8. The Parties agree that a stay of this case will not result in damages, prejudice, or
14 hardship to any party and is likely to save the Court and Parties significant resources, including
15 fees, costs, and time which would surely be expended if litigation were required to continue.

16 9. Therefore, the Parties jointly request that this action be stayed subject to the terms
17 of this Stipulation.

18 **IT IS SO STIPULATED.**

19 WRIGHT, FINLAY & ZAK, LLP

20 ROGER P. CROTEAU & ASSOCIATES,
21 LTD.

22 By: /s/ Yanxiong Li, Esq.
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By: /s/ Timothy E. Rhoda, Esq.
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Attorneys for Thunder Properties, Inc.

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

Dated: September 10, 2018